

SCANNED

DATE: 3-23-04 UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BY: CMB

FILED 03/22/04 P 3:19

BRUNO HOFFMAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

PHILIP LAUGHLIN, MICHAEL
SABOLINSKI, ALBERT ERANI, DONNA
ABELLI LOPOLOTI, JOHN J. ARCARI,
HERBERT M. STEIN, ALAN ADES,
BERNARD A. MARDEN, ALAN W. TUCK,
NOVARTIS PHARMA AG and
PRICewaterhouseCOOPERS, LLP,

Defendants.

Civil Action No.: 1:04-CV-10027 (JLT)

CHRISTOPHER GERARD AHEE, Individually
and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

PHILIP LAUGHLIN, MICHAEL
SABOLINSKI, ALBERT ERANI, DONNA
ABELLI LOPOLITO, JOHN J. ARCARI,
HERBERT M. STEIN, ALAN ADES,
BERNARD A. MARDEN, ALAN W. TUCK,
NOVARTIS PHARMA AG and
PRICewaterhouseCOOPERS LLP,

Defendants.

Civil Action No.: 1:04-CV-10517 (JLT)

**DECLARATION OF PETER LAGORIO IN SUPPORT OF THE
MOTION TO CONSOLIDATE THE RELATED CASES, APPOINT LORENE
CRAWFORD, ERIC D. WINKELMAN AS TRUSTEE FOR ERIC D.
WINKELMAN TRUST, KENNETH WIENER, AND VICTOR KRAIEM AS
LEAD PLAINTIFFS AND TO APPROVE LEAD PLAINTIFFS' CHOICE OF COUNSEL**

I, PETER LAGORIO, declare under penalties of perjury:

1. I am a member of the law firm of Gilman and Pastor, LLP. I make this Declaration in Support of the Motion to Appoint Lorene Crawford, Eric D. Winkelman as Trustee for Eric D. Winkelman Trust, Kenneth Wiener, and Victor Kraiem ("Movants") as Lead Plaintiffs Pursuant to Section 21D(a)(3)(B) of the Securities and Exchange Act of 1934, to Consolidate Related Cases, and to Approve Lead Plaintiffs' Choice of Counsel. The matters set forth herein are stated within my personal knowledge.

2. Attached hereto are true and correct copies of the following documents:

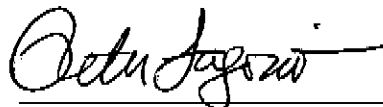
Exhibit A: Movants' sworn Certifications;

Exhibit B: Chart Of Movants' Losses;

Exhibit C: Firm resume for Bernstein Liebhard & Lifshitz, LLP; and

Exhibit D: Firm resume for Gilman and Pastor, LLP.

Dated: March 22, 2004

A handwritten signature in black ink, appearing to read "Peter Lagorio", is written over a horizontal line.

PETER LAGORIO (BBO #567379)